

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

RAHMON ALLEN,

Defendant.

Case No. 12-00291-18-CR-W-GAF

**MOTION FOR AN EXTENSION OF TIME FOR
GOVERNMENT TO FILE RESPONSES IN OPPOSITION TO
DEFENDANT'S MOTION TO DISMISS THE INDICTMENT**

The United States of America, by Timothy A. Garrison, United States Attorney, and Stefan C. Hughes, Assistant United States Attorney, both for the Western District of Missouri, requests a 30-day extension of time in which to file its response in opposition to defendant's Motion to Dismiss Indictment (D.E. 828). In support, the Government states the following:

1. On February 25, 2014, a federal grand jury returned a ten-count Second Superseding Indictment charging defendant Rahmon Allen with conspiracy to distribute one thousand (1,000) kilograms or more of marijuana and/or five (5) kilograms or more of cocaine, contrary to Title 21, United States Code, Section 841(a)(1) and (b)(1)(A);
2. On May 7, 2018, defendant Rahmon Allen filed a Motion to Dismiss Indictment. (D.E. 828.);
3. The Government's responsive motion is currently due on May 21, 2018. However, the Government is requesting a 30-day extension of time until June 20, 2018;

4. Undersigned counsel was in trial last week and focused exclusively on getting ready for such trial.

5. Therefore, undersigned counsel needs additional time to adequately research the issues raised and to adequately prepare its response in opposition;

6. No previous extension has been requested by the Government in this matter; Wherefore, for these reasons, the Government respectfully requests a 30-day extension of time until June 20, 2018, in which to file its response to defendant's Motion to Dismiss Indictment (D.E. 828).

Respectfully submitted,

Timothy A. Garrison
United States Attorney

By */s/ Stefan C. Hughes*

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was delivered on May 21, 2018, to the Electronic Filing System (CM/ECF) of the United States District Court for the Western District of Missouri for electronic delivery to all counsel of record.

/s/ Stefan C. Hughes
Stefan C. Hughes
Assistant United States Attorney